

MICHELE BECKWITH
Acting United States Attorney
ROBERT C. ABENDROTH
Assistant United States Attorney
501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
Facsimile: (916) 554-2900

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EMALATA LOLOHEA,
Defendants.

CASE NO. 2:24-CR-00318-DJC

STIPULATION TO CONTINUE STATUS
CONFERENCE AND TO EXCLUDE TIME
PERIODS UNDER THE SPEEDY TRIAL ACT
AND ORDER

STIPULATION

1. By previous order, this matter was set for status on March 13, 2025.
2. By this stipulation, the parties now move to continue the status conference until May 15, 2025, at 9:00 AM, and to exclude time between March 13, 2025, and May 15, 2025, under Local Codes T2 and T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Following her arrest based upon the indictment, Defendant Emalata Lolohea appeared in the Eastern District of California on January 14, 2025, and thereafter the Court ordered her release on conditions of pre-trial supervision. Co-defendants in this matter have yet to make their initial appearance. The Court has issued a writ ordering the transfer of one of the co-defendants from the custody of the State of California into Federal custody. The writ has yet to be executed, and the government intends to provide discovery upon the arrest of co-defendants

1 in the case.

2 b) The discovery that the government intends to produce includes cell phone
3 extractions of multiple devices, video footage, investigative reports, financial records, and other
4 materials constituting voluminous data. Because the materials to be produced in discovery
5 include personal identifying information, the government intends to move for a Protective Order.

6 c) Counsel for Emalata Lolohea has yet to receive discovery and will require
7 additional time to review the discovery materials and charges, conduct investigation, conduct
8 research related to the charges, to assess the viability of any pretrial motions, and arrange for in-
9 person visits to discuss potential resolutions with their client.

10 d) Counsel for Emalata Lolohea believes that failure to grant the above-requested
11 continuance would deny them the reasonable time necessary for effective preparation, taking into
12 account the exercise of due diligence.

13 e) The government also requires additional time to submit a proposed Protective
14 Order to govern the sharing and review of discovery, to produce the voluminous discovery, and
15 to coordinate the initial appearance of co-defendants in this case.

16 f) Based on the above-stated findings, the ends of justice served by continuing the
17 case as requested outweigh the interest of the public and the defendants in a trial within the
18 original date prescribed by the Speedy Trial Act.

19 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
20 *et seq.*, within which trial must commence, the time period of March 13, 2025 to May 15, 2025,
21 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), (B)(ii) and (iv) [Local
22 Codes T2 and T4] because it results from a continuance granted by the Court at the parties'
23 request on the basis of the Court's finding that the ends of justice served by taking such action
24 outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act warrant time periods excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 7, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ ROBERT C. ABENDROTH
ROBERT C. ABENDROTH
Assistant United States Attorney

Dated: March 7, 2025

By: /s/ William Flynn Portanova
WILLIAM FLYNN PORTANOVA
Counsel for Emalata Lolohea

ORDER

IT IS SO FOUND AND ORDERED this 10th day of March, 2025.

/s/ Daniel J. Calabretta
THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE